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FILE NO.: 00113.1820

May 13, 2022

**By ECF**

The Honorable Mary Kay Vyskocil  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/13/2022
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Re: *Meriyen Dominguez v. St. Barnabas Hospital et ano.*  
Docket No. 21 Civ. 8080

Dear Judge Vyskocil:

We represent Defendant St. Barnabas Hospital in the referenced action. We write jointly on behalf of all parties, and pursuant to Rule 2(G) of Your Honor's Individual Rules, to respectfully request a 60-day extension of the outstanding discovery deadlines in this action. The present deadline to complete fact discovery is May 18, 2022, and the present deadline to complete expert discovery is July 18, 2022. With the proposed extension, the new deadlines would be July 18, 2022 for fact discovery and September 16, 2022 for expert discovery. Furthermore, we respectfully request that the post-discovery conference, presently scheduled for August 2, 2022, be adjourned a commensurate 60 days.

The parties attended a good-faith mediation on April 21, 2022 in the hope of resolving this matter without the need for further litigation. Although we were unfortunately not able to reach a mutually acceptable settlement at the conclusion of the mediation, the parties were able to crystalize the issues in this action, which will allow for more streamlined and efficient discovery. The parties have both served interrogatories and document requests, but need additional time to respond to those demands and to conduct depositions. We also note that Plaintiff is deaf, and thus her deposition will require the use of two American Sign Language interpreters. Some lead time will be required to secure those interpreters.

This is the parties' first request for an extension of discovery deadlines in this action.

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We thank Your Honor for your time and attention to this matter.

Respectfully submitted,

*/s/ Marc A. Sittenreich*

Marc A. Sittenreich

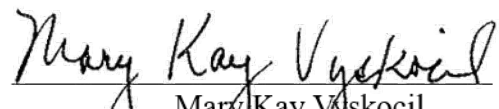
cc: All Counsel of Record

**GRANTED. The Fact Discovery Deadline is extended from May 18, 2022 to July 18, 2022. The Expert Discovery Deadline is extended from July 18, 2022 to September 16, 2022. The Post-Discovery Conference Scheduled for August 2, 2022 at 10:00 AM is ADJOURNED to October 4, 2022 at 10:00 AM. The Post-Discovery Conference will now be in-person in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York.**

**Absent exceptional circumstances, the Court will not further extend the discovery deadlines in this case.**

**SO ORDERED.**

Date: 5/13/2022  
New York, New York

  
Mary Kay Vysckosil  
United States District Judge

**GARFUNKEL WILD, P.C.**